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9 Microsoft Corporation

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 TS-OPTICS Corporation,
13 Plaintiff,
14 v.
15 Microsoft Corporation,
16 Defendant.

Case No. 8:24-cv-01974-DOC-DFM
DEFENDANT'S *SOTERA WIRELESS*
STIPULATION REGARDING
INVALIDITY CONTENTIONS

Defendant Microsoft Corporation (“Microsoft”) submits this stipulation regarding invalidity contentions.

On March 31, 2025, Microsoft filed an *inter partes* review (“IPR”) petition in case no. IPR2025-00767. Microsoft’s IPR petition asserts the following grounds of unpatentability based on obviousness under 35 U.S.C. § 103:

IPR Ground	Prior Art Reference(s)	Challenged Claims
1	Choi ¹ alone or with AAPA ²	1-4, 7-8, 10-13, 15, and 40
2	Choi in view of Ogata ³	1-4, 7-8, 10-13, 15, 40, and 43-45
3	Choi in view of Ogata and Santo	41-42
4	Choi in view of Ikeda ⁴	7-8
5	Choi in view of Ogata and Ikeda	40, 43-45
6	Choi in view of Ogata, Santo ⁵ , and Ikeda	41-42
7	Ogata in view of Kamata ⁶	36-38
8	Kabasawa ⁷ alone or with AAPA	17, 21, 23-24, 28
9	Miura ⁸ (alone or with AAPA) in view of Kamata	17, 19, 23-24, 26
10	Sugiyama ⁹ alone or in view of AAPA	1, 3-4, 10, 12-13
11	Sugiyama (alone or with AAPA) in view of Kabasawa	5-6, 14

Microsoft hereby stipulates that if the PTAB institutes the IPR2025-00767 proceeding, then Microsoft will not argue in this case that the asserted claims of the

¹ Korean Patent Appl. Pub. No. 2001-0038068A to Choi

² Applicant-Admitted Prior Art

³ Japanese Patent Appl. Pub. No. H4-113524A to Ogata

⁴ U.S. Patent Appl. Pub. No. 2003/0007430 A1 to Ikeda et al.

⁵ U.S. Patent No. 6,344,936 B1 to Santo

⁶ Japanese Patent Appl. Pub. No. 11-203697A to Kamata

⁷ U.S. Patent Appl. Pub. No. 2003/0067848 A1 to Kabasawa et al.

⁸ Japanese Patent Appl. Pub. No. JP2000123386A to Miura

⁹ Japanese Patent Appl. Pub. No. JP200118269A to Sugiyama

'055 patent are invalid in view of the grounds Microsoft either raised or could reasonably have raised in IPR2025-00767.

Dated: May 29, 2025

Respectfully submitted,

/s/ Andrew V. Devkar

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***Attorneys for Defendant Microsoft
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Civil Rule 5-3.3 and 5.4.

Dated: May 29, 2025

/s/ Andrew V. Devkar

Andrew V. Devkar